UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	MAG. JUDGE NO.:	03-882-MBB
V.)		
ROMAN VALDMA)		

JOINT MOTION TO EXTEND TIME WITHIN WHICH INDICTMENT MUST BE FILED

Pursuant to Title 18, United States Code, Section 3161(b), the United States of America and Defendant Roman Valdma ("Valdma") jointly move to extend the time within which an indictment must be filed in the above-captioned case.

As ground for this motion, the parties states that this matter is still under investigation and that many issues pertaining to any potential indictment remain unresolved at this time. Consequently, each party believes it is in its respective best interest to extend the time within which an indictment must be filed in the above-captioned case.

For the foregoing reasons, the parties request that the time within which an indictment must be filed in this case be extended until December 17, 2003. The parties further request that the Court issue an order of excludable delay to include the time from the filing of this motion until October 29, 2003.

Respectfully submitted,

MICHAEL J. SULLIVAN UNITED STATES ATTORNEY

ROMAN VALDMA

By his attorneys:

MATTHEW D. THOMPSON, ESQ.

By:

Assistant U.S. Attorneys

Dated: October 29, 2003